

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA

Plaintiff,

vs.

CITY OF SEATTLE

Defendant.

CASE No. 12-cv-1282-JLR

**MEMORANDUM SUBMITTING  
SEATTLE POLICE  
DEPARTMENT CRISIS  
INTERVENTION TRAINING**

Pursuant to the Second-Year Monitoring Plan, approved by this Court on March 24, 2014 (Dkt. No. 129), the Monitor hereby submits the attached, proposed Seattle Police Department's ("SPD") training materials on crisis intervention ("CI").

The materials include the following:

1. SPD's CI Training Strategy, attached hereto as Exhibit A
2. CI Basic Training Curriculum and Resources:
  - a. Lesson Plan, attached hereto as Exhibit B-1
  - b. Facilitator Guide, attached hereto as Exhibit B-2

1 c. Four e-learning modules, attached hereto as Exhibit B-3 through B-6

2 d. Resources Documents, attached hereto as Exhibit B-7 through B-10

3 3. Communications (a.k.a. “Dispatcher”) Training Curriculum:

4 a. Lesson Plan, attached hereto as Exhibit C-1

5 b. PowerPoint, attached hereto as Exhibit C-2

6 4. CI Coverage Strategy, attached hereto as Exhibit D

7 After careful review and consideration, the Monitor agrees with the Crisis Intervention  
8 Committee (“CIC”) and the Parties that this training represents an important advance in SPD’s  
9 approach to equipping its personnel with knowledge, resources, and tactics necessary to  
10 “reduc[e] the use of force against individuals in behavioral or mental health crisis, or who are  
11 under the influence of drugs or alcohol, and to direct or refer such individuals to appropriate  
12 services where possible.” Dkt. No. 3-1 at 41.  
13

14 In short, the proposed training satisfies the letter and spirit of the relevant substantive  
15 provisions of the Consent Decree and the Monitor respectfully requests that this Court approve  
16 it.  
17

18 **BACKGROUND**

19 The Department of Justice’s (“DOJ”) investigation in 2011, from which this matter  
20 sprung, found that SPD’s patterns of excessive force often arose from encounters with persons  
21 with mental illnesses or those under the influence of alcohol or drugs. Dkt. No. 1 at 7. This  
22 finding was particularly troubling because, by its own estimates, 70% of SPD’s use of force  
23 during that time period involved these populations. Dkt. No. 1-1 at 6.  
24

25 Paragraphs 23-25 of the Memorandum of Understanding (“MOU”) between the parties

1 and paragraphs 130-137 of the Consent Decree (Dkt. No. 3-1) required the Department to  
 2 develop policies and procedures to address these concerns. Importantly, these policies and  
 3 procedures were to be developed in collaboration with the CIC, an all-volunteer advisory  
 4 committee composed of the best and brightest of regional mental and behavioral health experts  
 5 (providers and clinicians), advocates, academics, outside law enforcement representatives, the  
 6 judiciary, and of course command-level members of the SPD. MOU at ¶ 23.

7 This collaboration bore fruit in the policies that this Court approved on February 10,  
 8 2014, and the institutionalization and re-vitalization of the “design and structure of its crisis  
 9 intervention program,” as required by the MOU. MOU at ¶ 25(e); Dkt. No. 121 (approval by  
 10 Court); *see also* Dkt. No. 120 (Monitor’s Memorandum Submitting the CI Policies).

11 Building off those achievements, and as required by the MOU and Consent Decree, the  
 12 SPD and its CIC<sup>1</sup> set off to evaluate and develop training for:

- 13 (1) All (non-specialized) officers who confront crisis events and who will receive basic  
 14 training on crisis intervention;  
 15  
 16 (2) Specialized CI-certified officers who will be highly trained, who will be dispatched to  
 17 every scene where the police communications center suspects a behavioral crisis, and  
 18 who, for the first time, will take primary responsibility at the scene of crisis events;  
 19 and  
 20  
 21 (3) Dispatchers and other communications personnel so that they may more readily  
 22

---

23  
 24 <sup>1</sup> To aid the efforts of the CIC, the DOJ arranged for two experts to be available to consult: Randy Dupont, Ph.D., from the University of  
 25 Memphis, an expert who played a crucial role in creating the CI Team for the Memphis (Tennessee) PD and dozens of other departments; and  
 Sgt. Elisabeth Eddy (retired), who played a similarly major role in formulating a prior iteration of CIT at SPD and was a CI instructor at the  
 Washington State Criminal Justice Training Center. Ellen Scrivner the Monitoring Team provided her knowledge of relevant issues gained as a  
 result of her role in the creation of CIT operations at the Chicago Police Department.

1 identify calls for service that involve behavioral or mental health crisis events.  
2 MOU at ¶ 25(c)-(d); Dkt. 3-1 at 133-135.

3 The following training accomplishes all of these goals and more as described below.

#### 4 **Training Presented**

##### 5 **A. CI Training Strategy**

6 A central insight developed over the course of several months of discussion with the CIC  
7 was that CI training had to be woven into the culture of the department, not through one-time-  
8 only training, but as a regular part of its training program going forward. The Training Strategy  
9 conceptualizes and represents the inculcation of these principles in a wave of “phases” of  
10 training.  
11

12 In Phase I, with few exceptions for even more highly trained officers, all sworn SPD  
13 personnel will attend the Basic (eight-hour) Crisis Intervention Training Class currently offered  
14 by the Washington State Criminal Justice Training Commission (“CJTC”). To reiterate, this is  
15 training for all 1300 officers done in collaboration and partnership with and at the CJTC.  
16 Furthermore, this is training that is largely funded by the King County MIDD fund and, thus, a  
17 cost-effective way for the City to proceed. Officers will then complete four e-modules,  
18 described in greater detail below.  
19

20 In Phase II, SPD will reinforce this training in several sessions of every officer’s  
21 contractually-required 32-hour “Street Skills” training.

22 In Phase III, those select officers (“CI-Certified”) who have shown an interest and  
23 aptitude for working with people in crisis will receive “advanced” training, on top of their  
24 required 40 hour training. The content of that training will be provided to the Court later this  
25

1 year, consistent with the Second-Year Monitoring Plan.

2 In Phases IV and V, this virtuous cycle is repeated for continued development and  
3 emphasis of these skills.

4 We wish to emphasize the following extremely important points. First, this training  
5 program begins to breakdown the “silo” SPD had created over time in which it separated itself  
6 from the best regional training initiatives. SPD is now pooling resources and collaborating with  
7 CJTC and the CIC on every step of this important initiative.

8 Second, the CI program they have developed (based on the “Memphis Model”)  
9 represents the best practices in urban policing and, more importantly, makes the Program  
10 relevant to patrol officers and the challenges they face on the street.

#### 12 **B. Basic Training**

13 Attached are the lesson plans and facilitator guides for the Basic Training that will occur  
14 at the CJTC. In order to get all 1300 sworn personnel through the Basic Training by December  
15 31, 2014, SPD has divided personnel into “key” and “non-key” personnel (only) for purposes of  
16 CI training. “Key” personnel are those officers assigned to units that are likely to engage with  
17 this population. They will attend the smaller (no more than 50 students per class) iterations  
18 currently offered at CJTC in order to better benefit from role playing scenarios. Non-key  
19 personnel will attend Super-Sessions presented in the CJTC Auditorium with class sizes up to  
20 400 students. This will allow all non-key personnel to have baseline knowledge of CI  
21 fundamentals by December 31, 2014.

22 Two additional points are particularly relevant here: first, the CJTC has been open and  
23 cooperative to changes in its lesson plans, both vis-à-vis the SPD and its CIC, even though it is  
24  
25

1 not subject to the Consent Decree. For example, a CIC member raised concerns about how  
 2 certain diagnoses were described and categorized in their lesson plan. The CJTC made changes  
 3 to its program after vetting it with its own subject matter experts.

4 Second, and again, the CJTC training is intended for all Washington State police  
 5 departments and sheriff offices. There are not “Seattle specific” parts of the training. Thus, the  
 6 e-learning modules supplement that training by:

- 7 1. Describing the new CIT policies and programs unique to Seattle;
- 8 2. Describing the emergent detention (involuntary treatment) process in King County
- 9 Mental Health Court;
- 10 3. Describing the many relevant resources available in King County and how to access
- 11 those resources; and
- 12 4. Describing and providing some examples of SPD’s unique “active listening” training.

13 Together the CI e-modules provide each officer the knowledge needed to ensure  
 14 compliance and implementation of the new Court-approved CI policies.  
 15

16 Finally, as part of the development of Basic Training, the CIC’s systems subcommittee  
 17 developed the following resources for officers, which line officers and the SPD Training unit  
 18 believed would be helpful to officers:  
 19

- 20 1. A summary of the Involuntary Treatment procedure in King County Mental Health
- 21 Court;
- 22 2. Schematics of the resources available system-wide in King County;
- 23 3. A decision-making chart for officers confronted with a crisis event; and
- 24
- 25

1 4. A Pocket Guide for officers to print and carry on key concepts and key resources in  
2 the County.<sup>2</sup>

3 Again, the Monitor and the Parties greatly appreciate the hard-work of the CIC and hope  
4 that the CIC finds it gratifying that its work is going directly into re-shaping the SPD.

5 **C. Dispatcher Training**

6 The new three hour CIT Dispatcher Training is for all 300 communications personnel.  
7 The training is intended to prepare SPD communications personnel to recognize individuals who  
8 are experiencing a behavioral crisis event and who need the assistance of a CIT-certified officer.  
9 It will also allow dispatchers to locate such an officer to address the individual.  
10

11 The dispatcher training materials were originally authored by members of the SPD and  
12 submitted to the CIC. As with the other types of training, the CIC, Parties, and Monitor have  
13 engaged in a process of revision and refinement of the dispatcher training materials that has been  
14 substantial, productive, and collaborative. That process has included an SPD-initiated pilot  
15 training of Dispatchers that has allowed for the integration dispatcher feedback into the training  
16 materials.  
17

18 The three-hour, in-person training course for dispatchers addresses four central elements:  
19 (i) communicating with an individual experiencing a crisis event; (ii) determining if mental  
20 illness is a factor in the incident; (iii) locating CI-certified officers; and (iv) identifying possible  
21 community mental health resources that can assist the subject in crisis. With respect to these  
22 elements, the training provides dispatchers with important instruction on critical skills. For  
23

24  
25 <sup>2</sup> The CIC data subcommittee has also developed a scientific survey of officer attitudes towards the CIT program, and forms and data collection plans that will revolutionize the way the department manages its officers who contact these populations going forward. These will be provided under separate cover on a later date.

1 instance, although communication dispatchers necessarily do not diagnose mental illnesses, the  
2 training provides dispatchers with techniques for facially recognizing the potential signs of  
3 schizophrenia, bi-polar disorder, depression, and other mental disorders that SPD officers often  
4 encounter. The training includes instruction on active interviewing skills to enable dispatchers to  
5 de-escalate crisis situations and to cull pertinent information from the individual so that officers  
6 can respond to the scene. The submitted training also includes instruction on how dispatchers  
7 can use SPD technology quickly and effectively to identify on-duty officers who are CI-trained  
8 and can be dispatched as necessary.  
9

10 Communications Dispatchers will also learn about important community resources that  
11 can assist SPD with CI events. These resources include services from the King County Mobile  
12 Crisis Team, the Crisis Clinic, and the Seattle Municipal Mental Health Court. The CIC's social  
13 service and clinical representatives have contributed significantly in ensuring that dispatchers  
14 receive necessary information about the full array of services and resources that are available to  
15 subjects in crisis.  
16

#### 17 **D. CIT Coverage Strategy**

18 Paragraph 130 of the Consent Decree (the "coverage provision") requires SPD to "ensure  
19 that CI [certified] officers are available on all shifts to respond to incidents or calls involving  
20 individuals known or suspected to" be in behavioral crisis. While it defines what training is  
21 required for an officer to become "certified," the Consent Decree does not define when  
22 "certified" officers must have completed their training, or conversely, how long ago is too long  
23 ago to be considered current on CI training.  
24

25 It is a complicated matter to determine which officers should be presently considered to



1 be “certified” and then to determine the effect that standard has for the coverage provision. It is  
2 not as simple as establishing a bright-line cutoff date, but must take into account the fact that  
3 some officers who were trained years ago may still be current in their skills due to continued use  
4 and the nature of their assignments. We appreciate the hard work of the CIC’s various  
5 subcommittees, the SPD, the DOJ, and the Monitoring Team consultants in coming to a  
6 workable and fair solution to this important question.

7         The CIT Coverage Strategy sets forth a reasonable and “holistic” process to identify  
8 those officers the Department wishes to hold out as “certified.” It has redundancy built in to  
9 capture those officers who should stay in the program, weed out those who do not wish to, and if  
10 there are not sufficient volunteers at this time to build a Program to meet the requirements of the  
11 Consent Decree.

12  
13         Pursuant to the Second-Year Monitoring Plan, by June 15, 2014, the Department will  
14 assess the effect of the process on the coverage provision. SPD, in short, will then know how to  
15 populate its revitalized, highly trained and dedicated CIT-certified officers.

#### 16         **E. Conclusion**

17  
18         The task of the Monitor was to duly consider if the proposed CI training embody the  
19 requirements of the Consent Decree. The Monitor and the Monitoring Team have determined  
20 that the training materials submitted here do so. Accordingly, the Monitor respectfully requests  
21 that this Court approve these training materials and order SPD to proceed with training  
22 dispatchers using the materials forthwith.

23 //

24 //

1 DATED this 30th day of May, 2014.

2 

3  
4 \_\_\_\_\_  
Merrick J. Bobb, Monitor

5  
6 IT IS SO APPROVED:

7  
8 \_\_\_\_\_  
9 HON. JAMES L. ROBART

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
MEMORANDUM SUBMITTING SEATTLE POLICE  
DEPARTMENT CRISIS INTERVENTION TRAINING  
FOR DISPATCHERS - 10  
Case No. 12-cv-1282-JLR

Merrick J. Bobb, Monitor  
Police Assessment Resource Center  
PO Box 27445  
Los Angeles, CA 90027  
(213) 623-5757

**CERTIFICATE OF SERVICE**

I certify that on the 30<sup>th</sup> day of May, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

J. Michael Diaz	<a href="mailto:michael.diaz@usdoj.gov">michael.diaz@usdoj.gov</a>
Jenny A. Durkan	<a href="mailto:jenny.a.durkan@usdoj.gov">jenny.a.durkan@usdoj.gov</a>
Jonathan Smith	<a href="mailto:jonathan.smith2@usdoj.gov">jonathan.smith2@usdoj.gov</a>
Kerry Jane Keefe	<a href="mailto:kerry.keefe@usdoj.gov">kerry.keefe@usdoj.gov</a>
Michael Johnson Songer	<a href="mailto:michael.songer@usdoj.gov">michael.songer@usdoj.gov</a>
Rebecca Shapiro Cohen	<a href="mailto:rebecca.cohen@usdoj.gov">rebecca.cohen@usdoj.gov</a>
Emily A. Gunston	<a href="mailto:emily.gunston@usdoj.gov">emily.gunston@usdoj.gov</a>
Timothy D. Mygatt	<a href="mailto:timothy.mygatt@usdoj.gov">timothy.mygatt@usdoj.gov</a>
Jean M. Boler	<a href="mailto:jean.boler@seattle.gov">jean.boler@seattle.gov</a>
Peter Samuel Holmes	<a href="mailto:peter.holmes@seattle.gov">peter.holmes@seattle.gov</a>
Brian G. Maxey	<a href="mailto:brian.maxey@seattle.gov">brian.maxey@seattle.gov</a>
Sarah K. Morehead	<a href="mailto:sarah.morehead@seattle.gov">sarah.morehead@seattle.gov</a>
Gregory C. Narver	<a href="mailto:gregory.narver@seattle.gov">gregory.narver@seattle.gov</a>
John B. Schochet	<a href="mailto:john.schochet@seattle.gov">john.schochet@seattle.gov</a>

DATED this 30th day of May, 2014.

/s/ Carole Corona  
Carole Corona